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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUANG VINHPHAM REGAN,
TRISHA MARIE REGAN, and
PAUL HWAN JIN,

Defendants.

Case No. 2:17-cr-00062-JCM-NJK

**MOTION TO WITHDRAW RESPONSE
TO DEFENDANT QUANG REGAN'S
MOTION TO SEVER [ECF No. 87]**

CERTIFICATION: This response is timely filed.

The United States of America, by and through undersigned counsel respectfully hereby submits this Motion to Withdraw Response to Defendant Quang Regan's Motion to Sever (ECF No. 87) which was filed in opposition to ECF No. 86. Government counsel has met and conferred with counsel for defendant Quang Regan and both parties agree to request that the Court sever Defendant Quang Regan and further agree to request that Quang Regan's trial be set after the trial of co-defendants Trisha Regan and Paul Jin has concluded

1 approximately six months from the current setting. Severance is beneficial for several reasons.
2 As an initial matter, difficulties with the discovery produced in this case in April 2017 to
3 Quang Regan require re-production of this discovery. Defense counsel has also requested
4 additional materials that require time for the government to gather and produce the requested
5 items and then time for the defense to analyze them. The trial in this case is currently set for
6 September 23, 2019. Both AFDP Brian Pugh and Erin Gettel, counsel for defendant Quang
7 Regan, are assigned to the trial in *US v. Long*, 2:16-cr-00071-APG-EJY, which is set for
8 January 13, 2019, and require time to prepare for and participate in that trial. They will then
9 require time to prepare for this trial. Plea negotiations are ongoing which may obviate the
10 need for trial but to allow adequate time for counsel to prepare the defense case, the parties
11 concur in the request that the Court sever defendant Quang Regan and set trial out six months
12 from the current setting for the reasons stated herein.

13 **WHEREFORE**, for all the foregoing reasons, the government respectfully
14 requests that the Court grant the motion to withdraw its prior Response (ECF No.
15 87) and concurs in the request to sever Defendant Quang Regan and set his trial
16 after the trial of his co-defendants approximately six months from the current
17 setting.

18 **DATED** this 5th day of September 2019.

19 Respectfully submitted,

20 NICHOLAS A. TRUTANICH
21 United States Attorney

22 //s//
23 NADIA AHMED
24 Assistant United States Attorney
Attorneys for the United States

